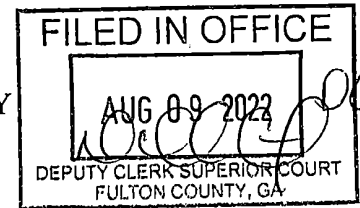


## **EXHIBIT B-058**

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA



IN RE:  
SPECIAL PURPOSE GRAND JURY

2022-EX-000024

Judge Robert C.I. McBurney

**RUDOLPH WILLIAM LOUIS GIULIANI'S REPLY TO THE STATE'S RESPONSE  
TO HIS EMERGENCY MOTION TO CONTINUE HEARING/GRAND JURY  
APPEARANCE PURSUANT TO O.C.G.A § 24-13-26**

COMES NOW, Rudolph William Louis Giuliani, by and through counsel, William H. Thomas, Jr. and pursuant to O.C.G.A. § 24-13-26, and replies to the State's response to Mr. Giuliani's motion for continuance of his scheduled Grand Jury Appearance on August 9, 2022. In support of his request for continuance, Mr. Giuliani shows as follows.

(1)

In response to Mr. Giuliani's Motion to Continue Hearing/Grand Jury appearance, the state notes that "the Witness purchased multiple airline tickets *with cash*, including tickets to Rome, Italy, and Zurich, Switzerland for travel dates ranging between July 22, 2022 and July 29, 2022" and "that [a]ll of these dates were after the Witness's medical procedure. (emphasis added).

First, and foremost, conspicuously absent from the state's pleading is the fact that no such travel ever occurred. Secondly, Mr. Giuliani **never** purchased airline tickets in cash, or otherwise. The complete facts are as follows.

Prior to his medical procedure, an international organization had invited Mr. Giuliani to attend a conference overseas. The planning and invitation for this event occurred weeks, if not months, prior to Mr. Giuliani's medical procedure. In addition to Mr. Giuliani attending the

conference, other U.S. officials and dignitaries were scheduled to attend. Ultimately the conference was canceled by the organizers, due in part, to Mr. Giuliani's health. Again, Mr. Giuliani himself did not purchase any tickets for himself or anyone else. Presumably, the event organizers or some other third-party could have purchased tickets on his behalf, but that is unknown to Mr. Giuliani or his counsel. In any event, Mr. Giuliani has not travelled by plane to any location following his surgical procedure.

During the time Mr. Giuliani was scheduled to be overseas, he was also scheduled to give a speech in Rome, Italy. Again, this scheduled appearance pre-dated the medical procedure at issue. Mr. Giuliani did not purchase any tickets for Rome. He did not fly to Rome or anywhere else following his surgery. Mr. Giuliani, based solely on his health, canceled his speech in Rome. Mr. Giuliani has no knowledge of anyone else purchasing tickets for him to travel to Rome, but in any event he did not go.

It is important to note that these concerns were never raised with Mr. Giuliani's New York counsel, or the undersigned when attempting to seek a reasonable accommodation of this matter. (*See Exhibits H – J, of Mr. Giuliani's original motion to continue*). Had these concerns been raised at any time prior to the filing of the motion to continue, these facts would have been provided to the State. The State, however, rather than engage in meaningful dialogue to achieve a workable solution here, elected not to return a phone call to the undersigned, after promising to do so on Friday afternoon, necessitating the filing of the instant motion to continue. To reiterate for the Court, *and most importantly the State*, Mr. Giuliani is not seeking to avoid, disrupt or inappropriately delay these proceedings. He simply seeks some reasonable accommodation based on a documented health concern.

Dated: August 8, 2022.

Respectfully submitted,

*William H. Thomas Jr.*

William H. Thomas, Jr.  
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IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

IN RE:	)	
SPECIAL PURPOSE GRAND JURY	)	2022-EX-000024
	)	
	)	Judge Robert C.I. McBurney
	)	
	)	

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the following pleading:

**RUDOLPH WILLIAM LOUIS GIULIANI'S REPLY TO THE STATE'S RESPONSE  
TO HIS EMERGENCY MOTION TO CONTINUE HEARING/GRAND JURY  
APPEARANCE PURSUANT TO O.C.G.A § 24-13-26**

by statutory electronic service, on August 8, 2022, upon:

Fani.WillisDA@fultoncountyga.gov

Fani Willis, District Attorney  
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[Signature Page to Follow]

Respectfully submitted,

William H. Thomas, Jr.

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